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January 2, 2018

May Ma
Office of Administration
Mail Stop: OWFN-2-A13

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Holtec International Comments on Draft NUREG-2215, Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities

Reference: [1] NRC-2017-0211, Draft "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities," dated November 15, 2017
[2] NEI Letter, "Industry comments on draft 'Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities' draft NUREG-2215, 82 Federal Register 52944, November 15, 2017 (Docket ID: NRC-2017-0211)," from R. McCullum (NEI) to M. Layton (NRC) dated December 21, 2017

Dear Ms. Ma:

Holtec International appreciates the opportunity to comment on the NRC's draft "Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities" [1]. Holtec is very interested in the NRC guidance, for providing increased clarity and efficiency for future applications.

Holtec has participated with the industry comment consolidation and supports the comments submitted by the Nuclear Energy Institute [2]. Specifically, we believe further interaction between the NRC staff and stakeholders prior to final issuance of the NUREG is necessary to achieve the improvements in the regulatory process for which this NUREG is intended. The draft document provided for review appears to provide significant areas where new or modified regulatory positions have been stated without providing technical basis for these changes. As examples, with the incorporation of Interim Staff Guidance documents (ISGs), those on retrievability and thermal temperature limits appear to have different guidance than previously provided in the issued versions of ISG-2 and ISG-11. Items such as those are too complex, and too severe in their possible consequences, to simply be addressed in written comments. Hence, Holtec supports NEI's suggestion that further interactions be scheduled between stakeholders and the NRC staff prior to issuance of the final guidance document to address these concerns in appropriate detail.

If you have any questions please contact me at 856-797-0900 ext. 3951.

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SUNSI Review Complete
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E-RIDS = ADM-03
Add = Jeremy Smith (3955)



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Sincerely,

Kimberly Manzione
Licensing Manager,
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cc: (via email)
Mr. John McKirgan, USNRC
Mr. Michael Layton, USNRC
Mr. Meraj Rahimi, USNRC